

# Exhibit A

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SUZANNE BOELTER, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

HEARST COMMUNICATIONS, INC.,

Defendant.

Civil Action No. 15-cv-03934-AT

JOSEPHINE JAMES EDWARDS, individually  
and on behalf of all others similarly situated,

Plaintiff,

v.

HEARST COMMUNICATIONS, INC.,

Defendant.

Civil Action No. 15-cv-09279-AT

**PLAINTIFFS' OBJECTIONS TO DEFENDANT HEARST COMMUNICATIONS,  
INC.'S NOTICES OF VIDEOTAPED DEPOSITION TO PLAINTIFFS  
SUZANNE BOELTER AND JOSEPHINE JAMES EDWARDS**

PLEASE TAKE NOTICE that, pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, Plaintiffs Suzanne Boelter and Josephine James Edwards ("Plaintiffs") hereby object to Defendant Hearst Communications, Inc.'s ("Hearst") notices of videotaped deposition.

Deposition discovery during Phase I is premature and inefficient as it will likely result in Plaintiffs being noticed for more than one deposition in this class action case. *See* Fed. R. Civ. P. 30(a)(2)(A)(ii). Plaintiffs offer to confer in good faith to resolve any issues that may arise by virtue of these objections.

Dated: August 29, 2016

Respectfully submitted,

By: /s/ Joseph I. Marchese  
Joseph I. Marchese

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*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on August 29, 2016, I caused true and correct copies of the foregoing to be served on all counsel of record via e-mail.

/s/ Philip L. Fraietta  
Philip L. Fraietta